Update on U.S. EPA Rodenticide Risk Mitigation Decision

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Main Points of the Mitigation

- Make the three more toxic anticoagulants available for residential application by professional applicators.
- Require all consumer products be sold in a bait station.

Product Use Groups

- Consumer use products.
- Agricultural use products.
- Professional applicator products.
- Field use products.

Consumer Use Products

- 1st Generation anticoagulants and non-anticoagulants:
  - Formulated as solid bait blocks (paste okay) in pre-baited stations*.
  - Package size not to exceed 1 pound.
- 2nd Generation anticoagulants:
  - Sale and distribution to prohibit purchase.

*Bait stations must adhere to one of four tiered standards.

Agricultural Use Products

- 2nd Generation anticoagulants:
  - Placement allowed in and around AG* buildings *(within a 50 foot perimeter)*.
  - Bait stations required for outdoor/above ground placements.
  - Sold ONLY in agricultural, farm & tractor stores with package size between 8 and 16 pounds.

*Labels must bear the statement:
"Do not use this product in homes or other human residences."

Professional Applicator Products

- 2nd Generation anticoagulants:
  - Placement allowed in and around buildings *(within a 50 foot perimeter)*.
  - Bait stations required for residential, institutional, and outdoor/above ground placements.
  - Sold ONLY in agricultural, farm & tractor stores, and direct sales with package size at least 16 pounds.

Agricultural Use/Professional Applicator Products

- 1st Generation anticoagulants and non-anticoagulants:
  - Any formulation acceptable. Bait stations required for certain placements.
  - Package size must be of at least 4 pounds.

Field Use Products

- The risk mitigation decision does not cover field uses and tracking powder.
  - Risks were addressed in the 1998 Zinc Phosphate and Rodenticide Cluster Reregistration Eligibility Decision documents.
  - U.S. EPA is requiring restricted use classification for these products *(except underground baiting)*.

U.S. EPA Timelines

- September 2, 2008
  - 90 day compliance proposal for all products.
- December 4, 2009
  - Label amendment or new product registration.
- December 4, 2010
  - U.S. EPA decisions made on all amendments.
- June 4, 2011
  - Last day for “release for shipment” of products not complying with the risk mitigation decision.

Suggested Compliance Proposal

90-Day Response Form for the May 2008 Rodenticide Risk Mitigation Decision

Company Name: _____ Company Number: _____

Active Ingredient: _____

In column 1, please list the EPA Registration Number for all products registered to your company that contain the active ingredient identified above. Please mark one box per row (columns 2-8) indicating your company's intended method for complying with the May 2008 rodenticide risk mitigation decision. Please also complete items 9-15.

1. EPA Product Registration Number	Intended Method for Complying with the May 2008 Rodenticide Risk Mitigation Decision						8. I do not intend to voluntarily bring this product into compliance with the requirements of the May 2008 risk mitigation decision. I understand that EPA may pursue additional regulatory action, including cancellation.
	2. Product is a technical grade or manufacturing use product that currently complies with the requirements set forth in the May 2008 risk mitigation decision.	3. Product is labeled solely for outdoor, below-ground control of moles and pocket gophers, and therefore the May 2008 risk mitigation decision does not apply.	4. Product is labeled solely for outdoor field uses, and therefore the May 2008 risk mitigation decision does not apply.	5. Product is a tracking powder product, and therefore the May 2008 risk mitigation decision does not apply.	6. I will submit an application on or before 12/4/09 to amend this product to comply with the requirements of the May 2008 risk mitigation decision.	7. I wish to voluntarily cancel this product under FIFRA 6(f) (effective on or before 6/4/2011), and a letter requesting cancellation is included with this 90-Day Response.	

9. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete.

10. Signature of Company's Authorized Representative:

_____ _____

Signature **Date**

11. Phone Number: _____

12. Email: _____

13. Printed Name of Authorized Representative: _____

14. Title: _____

15. Name of Company: _____

Please reproduce this page if additional lines are needed for your company's response.